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UNITED STATES DISTRICT COURT - NORTHERN DISTRICT OF CALIFORNIA

TETYANA DORSANEO,

Plaintiff,

vs.

EDWARD DORSANEO,

Defendant

Case No.: 4:17 – CV – 00765

ANSWER TO COMPLAINT

Comes now defendant, EDWARD DORSANEO and for his answer alleges as follows:

1. Defendant admits the allegations of paragraphs 1 and two of the complaint
2. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in paragraph three of the complaint.
3. Defendant admits the allegations of paragraphs four through six inclusive of the complaint.
4. Defendant lacks knowledge or information sufficient to form of a belief about the truth of the allegations contained in paragraph seven and eight of the complaint.
5. Defendant admits the allegations of paragraphs 9 and 11 of the complaint.
6. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in paragraph 10 of the complaint
7. Defendant lacks knowledge or information sufficient to form a belief of about the truth of the allegations contained in paragraph 13 through 23 inclusive of the complaint.
8. Defendant admits the allegations of paragraphs 24 through 27 of the complaint
9. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations contained in paragraphs 28 through 33 inclusive of the complaint
10. Defendant lacks knowledge or information to form a belief about the truth of the allegations contained in paragraphs 35 through 45 inclusive of the complaint.

AFFIRMATIVE DEFENSES

Defendant asserts the following affirmative defenses:

1., Defendant alleges and asserts that any alleged contract or third-party beneficiary contract was procured by the fraud of plaintiff as she married defendant only to obtain a green card and eventual citizenship of this country and never intended to stay married to him.

2, Defendant alleges and asserts that plaintiff is estopped from being bringing the instant claim because she never intended to fulfill her marriage to defendant which was the basis for obtaining a green card and eventual citizenship of this country.

3, Defendant alleges and asserts that any alleged contract or third-party beneficiary contract was procured illegally as plaintiff acted in violation of law by defrauding defendant only to obtain a green card and eventual citizenship of this country and for no other reason.

WHEREFORE, defendant prays:

- 1, That this claim be dismissed with prejudice;
2. That defendant be awarded his attorney fees;
3. That defendant be awarded his costs;
4. And for such further and other relief that this Court deems just and in proper.

Dated this 10 of April, 2017.

/s/ Jeffrey B Neustadt
Jeffrey B Neustadt
Attorney for defendant, EDWARD DORSANEO